

ADDITIONAL COMMENTS ON FEIR

From: "Mark Nelson"

Date: Sep 19, 2017 6:13 PM

Subject: Comments to SDSU Board of Trustees for General Session 9-20-17

To: "Laura Shinn" <lshinn@mail.sdsu.edu>, "Trustee Secretariat" <TrusteeSecretariat@calstate.edu>, "White, Timothy" <twhite@calstate.edu>, "OPR State Clearinghouse" <state.clearinghouse@opr.ca.gov>
Cc:

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September 19, 2017

Written Comments for Distribution to Full Panel of CSU Trustees and Alternates at September 20, 2017 Meeting by the Trustee Secretariat

By email for distribution to the Trustee Secretariat

SDSUs stated need for student housing (SDSUs CEQA Purpose and Need) remains unchanged since its DEIR, and SDSUs removal of Phase II and Phase III to vacate significant impacts constitutes piecemealing under CEQA

In a May 24, 2017 presentation (selected page attached), SDSU senior administration demonstrated that SDSU continues to have an approximate need for 1700 beds (nearly the exact size of Phase II and Phase III). That presentation demonstrates that SDSUs Purpose and Need for the Project represented in SCH# [2016121025](#) is unchanged from the NOP and DEIR. As a result, SDSUs elective reduction of Phase II and Phase III, without any material change in SDSUs stated need for the project described in the NOP and DEIR, constitutes piecemealing under CEQA. The totality of SDSUs project is represented in SDSUs internal documents (the presentation cited above) and consideration of only Phase I at this time represents a failure to consider the whole of the project.

SDSU cannot electively subdivide a project to avoid significant environmental impacts for convenience. SDSU has stated, in writing, in response to a Public Records Act request, that it need for housing remains at the size of Phase I + Phase II + Phase III.

Consideration of Phase I at this time, in the face of SDSUs continued, larger, documented need for housing, represents segmentation of the project for the express purpose of avoiding environmental review of the project's entirety.

SDSU should NOT certify Phase I using a piecemealing strategy.

Additionally, since SDSUs own documentation validates SDSUs housing need at over 2,000 beds, well above the 850 in Phase I, SDSU should fully utilize Lot U/9 at its higher density 1,400 bed configuration as demonstrated in SDSUs work commission by Carrier Johnson in 2013.

Sincerely,

Mark Nelson

Documentation of SDSUs Residence Hall Housing Need

Presentation to: SDSU Housing Proposal Review Committee, dated May 24, 2017

Slide: Housing Demand and Capacity Chart (inferred from chart)

Year Beds Change Addl SDSU Bed Need

2018 5089

2019	5764	+675	Phase I included as supply
2020	7301	+1537	Approx 1700 more beds after 850 from Phase I



